

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

KIERAN RAVI BHATTACHARYA,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.: 3:19-CV-00054
)	
JAMES B. MURRAY, JR., et. al.,)	
)	
Defendants.)	
)	

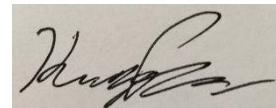
DECLARATION OF KIERAN RAVI BHATTACHARYA

I, Kieran Ravi Bhattacharya, hereby state as follows under penalty of perjury:

1. I make this Declaration to advise the Court of certain facts, of which I have personal knowledge, relevant to Plaintiff's Motion for Leave to File Second Amended Complaint.
2. On September 20, 2019—four days after I filed my *pro se* Complaint in this case—I discussed its filing in open court in Angel Hsu's presence with her attorney, Geri Greenspan, a faculty member at UVA Law School.
3. During a protective order hearing that day before Judge David Barredo, Angel Hsu referenced the microaggression panel discussion and ASAC's suspension of me from UVA Med School. Angel Hsu also testified under oath that she had been involved in the involuntary hospitalizations described in the Second Amended Complaint and characterized me as having been “hypomanic” during the period from approximately October 24, 2018 through February 1, 2019. At the September 20, 2019 protective order hearing, Angel Hsu also testified about her involvement in getting my mother to sign the November 19, 2018 Emergency Custody Order referenced in the Second Amended Complaint.

4. During the September 20, 2019 hearing, Angel Hsu also cited the No Trespass Order and presented a one-page letter from Dean Peterson to support her purported need for protection and her request that she receive complete ownership of Taro, our Rottweiler puppy.

5. The protective order was issued and is scheduled to expire on September 21, 2021.



Kieran Ravi Bhattacharya

01 July, 2021

Date